

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
Curtis A. Raymond	:	Chapter 13
Anne M. Raymond	:	
Debtor(s)	:	Case No.: 19-15647-ELF

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**MOTION TO VACATE ORDER GRANTING  
DISMISSING OF THE CHAPTER 13 CASE**

Debtors, Curtis and Anne Raymond, by and through Attorney Brad J. Sadek, Esq., move this Honorable Court to vacate the December 7, 2021 Order Dismissing the Chapter 13 case and in support thereof aver the following:

1. The above captioned bankruptcy matter was filed as a Chapter 13 on September 11, 2019.
2. The Chapter 13 Plan was confirmed on April 21, 2020.
3. An Order was entered on April 14, 2021 permitting the debtors to Modify their Chapter 13 plan, extending the plan to a total of 84 months as provided under the CARES Act.
4. On November 8, 2021, a Motion to Dismiss was filed for the debtors' alleged failure to make timely monthly payments to the Chapter 13 Trustee.
5. Per the Trustee's ledger, on December 8, 2021, a lump sum payment of \$3,640.00 was credited to the debtors' account, substantially reducing the past due arrears prior to the scheduled Hearing date.
6. On December 7, 2021, an Order was entered dismissing the debtors' Chapter 13 case.
7. On December 10, 2021, the debtors scheduled a payment of \$1,605.00 and due to the dismissal of the case, this payment has not yet been credited to the debtors' account per the Trustee's ledger to date.

8. The debtors have brought their Chapter 13 Plan current to date with the next payment coming due January 11, 2022.
9. Debtors wish to continue making regular monthly payments to the Standing Chapter 13 Trustee in order to avoid future modifications to the Automatic Stay.

WHEREFORE, Debtors, by and through the undersigned counsel, respectfully request this Honorable Court to enter an Order Vacating the December 7, 2021 Order dismissing the Chapter 13 case.

Respectfully submitted,

Dated: December 17, 2021

/s/ Brad J. Sadek, Esquire  
Brad J. Sadek, Esquire  
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